

BOULT
CUMMINGS
CONNERS
& BERRY
PLC

Henry Walker
(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@bccb.com

LAW OFFICES
414 UNION STREET, SUITE 1600
POST OFFICE BOX 198062
NASHVILLE, TENNESSEE 37219

August 15, 2000

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REGULATORY AUTH.

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TELEPHONE (615) 244-2582
FACSIMILE (615) 252-2380
INTERNET WEB <http://www.bccb.com/>
EXECUTIVE

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
360 James Robertson Parkway
Nashville, TN 37201


Re: Tariff Filings by all Telephone Companies Regarding Reclassification of
Pay Telephone Service as Required by FCC Order 96-439
Docket No. 97-00409

Dear Mr. Waddell:

Please accept for filing the original and thirteen copies of the Tennessee Payphone Owners Association's response to the Consumer Advocate Division's data requests. Copies have been provided to parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/nl
Enclosure

POSTED

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

RE: TARIFF FILINGS BY LOCAL EXCHANGE COMPANIES TO
COMPLY WITH FCC ORDER 96-439 CONCERNING THE
RECLASSIFICATION OF PAY TELEPHONES

DOCKET NO. 97-00409

RESPONSES OF TENNESSEE PAYPHONE OWNERS ASSOCIATION
TO DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE DIVISION OF THE
ATTORNEY GENERAL'S OFFICE

The Tennessee Payphone Owners Association ("TPOA") hereby makes the following responses to the discovery requests and requests for production submitted by the Consumer Advocate.

1. For each month, January 1997 to present, identify by wire center:
 - a. The number of payphone lines obtained by association members from local incumbent exchange companies.

RESPONSE:

As the TRA has ruled in other proceedings, TPOA and other trade organizations are not required to respond to discovery on behalf of individual members. Notwithstanding that objection and without waiving it, TPOA provides the attached list of TPOA members and the number of lines of each member. This list is the only information kept by the TPOA describing the organization's members.

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2. For each month, January 1997 to present, identify by local exchange carrier:
 - a. The average cost per payphone line paid by the association members.
 - b. The average revenue per payphone line collected by the association members.

Provide detailed work papers supporting the calculation of the average cost and revenue.

RESPONSE:

- 2a. The rates currently paid by TPOA for payphone access lines are set forth in the tariffs of BellSouth, Sprint-United, and Citizens. The total cost of each line typically varies with usage. TPOA is in the process of determining the average number of calls and the average duration of a call made from a TPOA-owned payphone. Such information, however, can be more readily obtained from the local exchange carrier.
- 2b. TPOA objects to providing information about the average revenue per payphone line collected by TPOA members. Unlike the cost information described above, average payphone revenue has nothing to do with the purpose of this proceeding which is to determine whether BellSouth's proposed rates are cost-based, non-discriminatory, and consistent with Section 276 and the "new services test."

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Walker', is written over a horizontal line.

Henry Walker
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, TN 37219
(615) 252-2363

Attorney for Tennessee Payphone Owners
Association

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2000 a copy of the foregoing document was served on the parties of record, via U.S. Mail, addressed as follows:

Richard Collier, Esq.
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

T.G. Pappas, Esquire
Bass, Berry & Sims
2700 First American Center
Nashville, Tennessee 37219-8888

James Wright, Esquire
United Telephone-Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587

Jon Hastings, Esquire
Boult, Cummings, Connors & Berry
414 Union Street, Suite 1600
Nashville, Tennessee 37219-8062

Richard Tettlebaum, Esq.
Citizens Telecom
6905 Rockledge Dr.
Suite 600
Bethesda, MD 20817

James P. Lamoureaux
AT&T Communications of the South Central
States, Inc.
1200 Peachtree Street
Room 4060
Atlanta, Georgia 30309

Val Sanford, Esquire
Gullett, Sanford, Robinson & Martin
230 Fourth Avenue North
Third Floor
Nashville, Tennessee 37219-8888

Guy M. Hicks, Esquire
BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

Vincent Williams, Esq.
Consumer Advocate Division of the Attorney
General's Office
426 5th Ave., North, 2nd Floor
Nashville, TN 37243

Guilford F. Thornton, Jr., Esq.
Stokes Bartholomew Evans & Petree
Sun Trust Center
424 Church St., Suite 2800
Nashville, TN 37219-2386


Henry Walker

ATTACHMENT

**TPOA
Dues Report
2000**

Company	No. of Phones
American Communication Services	UN
Award Enterprises	164
Aztex Enterprises	46
BBI	64
Casco Payphones	217
CFI,LLC	UN
Coin Phone Management	528
Coin Phones of America	176
Coin Tel	123
Coin Tel Systems	38
Cumberland Telecom	42
D&D Marketing (new owner, M. Tucker)	21
D&T Payphones	145
Davel Communications(Monthly plan)	4177
DGI Communications	200
ETS Payphones	UN
Executive Telecommunications	13
GTR	277
Jackson Communications	37
K&H Network	300
Knoxville Payphone and Vending	107
KPV Enterprises	148
L&B Enterprises	15
M&L Payphones	50
Memphis Payphones	3
Momatel Company	80
Money Makers	9
Nationwide Payphone Company	UN
Nowell Communications	24
P&D Telecommunications	214
PAR Phones	110
Payphones 4U	10
Procomm Inc.	207
Rentel	2
Samco Communications	87
Scarborough Enterprises	9
Skynet	6
SLT Ventures (dropped from APCC)	UN
Southern Telecommunications	88
Taylor Cameron Properties	17
Tennessee Payphone Services	26
Tennessee Telephone Audit Services	UN
Tennessee Valley Communications	75
Tennessee Valley Paytel	425
TIC	UN
Totals	8280

TENNESSEE PAYPHONE OWNERS ASSOCIATION
1999 MEMBERSHIP DUES REPORT
July 22, 1999

COMPANY	CONTACT	# PHONES IN TN
American Communications Services	Richard Zachary	18
Award Telecom	Jennifer Trammell	165
BBI	Ron Craig	50
Calls for Less Inc. CfL Inc.	Terry Anderson	22
Casco Payphones	Charles Cook	192
Coin Phone Management Company	Tom Rose	440
Coin Phones of America	Doug Henderson	170
Coin Tel	Rob Hendricks	83
Coin Tel Systems	Larry Travis	31
Cumberland Telecom	Bob Kitchener	22
D & D Marketing, Inc.	David Mallery	4
D & T Payphones, Inc.	Terry & Debbie Driskill	141
DGI Communciations	Kim Brady	205
Davel Communications Group Inc	Teddy Rammekamp	3,129
ETS Payphones, Inc.	Randy Garrett	100
Executive Telecommunications	Donna & Michael Guyton	13
Gotel Communications	Orlando Gonzalez	22
GTR, Inc	Bill Gardner	258
K & H Network, Inc.	Richard Kendall	312
Knoxville Payphone & Vending	Michael Gray or Bill Dupree	287
L & B Enterprises	Bret Thomas	11
M & L Pay Phones	Jim McCullough	13
Momatel Company	Carla McWhorter	83
Money Makers Coco Telco	Chuck Ryan	13
Nationwide Payphone Co.	Charles Henderson	25
Nowell Communications	Steve Nowell	17
P & D Telecommunications	David McKinney Pam McKinney	217
PAR Phones	Dan Pierce	113
Payphones 4 U	George Huddleston Jr.	5

COMPANY	CONTACT	# PHONES IN TN
Triad, Inc.	Hal Riley	
Universal Communications, Inc.	Cheryl Barker	
TOTALS		7,091

Mailed Dues Invoice December 10, 1998.

Mailed Second Notices January 8, 1999.

Called Members of Non-Paid Dues January 27, 1999.

Mailed Final Notices February 8, 1999.